

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS LIABILITY)
LITIGATION)

THIS DOCUMENT RELATES TO:)
)
)
ALL CASES)
)

) MDL No. 2419
) Dkt. No 1:13-md-2419 (RWZ)

**SAINT THOMAS ENTITIES' MOTION TO COMPEL INVOKING DEFENDANTS TO
PRODUCE CERTAIN DOCUMENTS**

For the reasons stated forth in their memorandum in support, which is being filed contemporaneously, Saint Thomas Health, Saint Thomas Network, and Saint Thomas West Hospital, formerly known as St. Thomas Hospital (the "Saint Thomas Entities") request an order compelling Barry Cadden, Gregory Conigliaro, Douglas Conigliaro, Carla Conigliaro, and Glenn Chin to produce the documents the government has produced to them in *U.S. v. Cadden, et al.*, No. 1:14-cr-10363-RGS, other than patient medical records and prescription records.

SAINT THOMAS WEST HOSPITAL,
FORMERLY KNOWN AS ST. THOMAS
HOSPITAL, SAINT THOMAS NETWORK,
AND SAINT THOMAS HEALTH

By their attorneys,

/s/ Sarah P. Kelly

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*Appearing *Pro Hac Vice*

RULE 7.1 CERTIFICATION

I hereby certify that counsel for the Saint Thomas Entities previously corresponded with various representatives of the individual criminal defendants to resolve or narrow the issue raised in this motion, but received no response.

/s/ Sarah P. Kelly
SARAH P. KELLY

CERTIFICATE OF SERVICE

This certifies that a true and accurate copy of the foregoing was served on all parties of record by virtue of the Court's electronic filing system this 30th day of July, 2015.

/s/ Sarah P. Kelly
SARAH P. KELLY

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